

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America
v.
MATTHEW PHILIP RUSSO, a/k/a "Rambo"

Case No. 24-mj-6045-AOC

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/25/2022 & 06/08/2022 in the county of Broward County in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 841(a)(1)

Distribution of a Controlled Substance

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



S/A Jason Davis, ATF

Printed name and title

Attested to by the applicant in accordance with
the requirements of Fed. R. Crim. P. 4.1 by:
FACETIME

Date:

2/1/24

City and state:

Fort Lauderdale, FL



Judge's signature

HON. ALICIA O. VALLE

Printed name and title

AFFIDAVIT

I, Jason Davis, being duly sworn, state and depose that:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed since November 2019. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have my bachelor's degree in Political Science from Lander University. I am currently assigned as a Special Agent for ATF Miami Field Division, Fort Lauderdale Field Office. As an ATF agent, I have authority to investigate Title 18 and Title 21 offenses. I received specific training in the areas of firearms, narcotics, explosives, and arson investigations. I have investigated cases involving federal firearm and narcotic violations, unlawful possession of firearms, the possession of firearms by armed drug traffickers, illegal exportation of firearms, dealing in firearms without a license, homicides, and the distribution of illegal narcotics. Before my employment with the ATF, I was a Special Agent for approximately three (3) years with the United States Secret Service. While in the Secret Service, I investigated financial crimes, and more specifically, threats against the President(s) of the United States in a Protective Intelligence Squad. Prior to my Federal Law Enforcement career, I was an active duty Commissioned Infantry/Psychological Operations Officer with the United States Army, where I continue to serve in a reserve capacity with the United States Special Operations Command.

2. I submit this affidavit based on information known to me personally from the investigation, as well as information from other law enforcement officers who have investigated this matter, or other individuals who have personal knowledge of the facts herein. As such this affidavit does not contain all the information known regarding this investigation, but only those facts necessary to establish probable cause to issue a criminal complaint charging Matthew RUSSO, a/k/a "Rambo,"

YOB: 1994, with distribution of a controlled substance, to wit fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

PROBABLE CAUSE

3. During the month of March 2022, an ATF undercover hereinafter "UC" actively monitored the Instagram account wawa_rambo119. The person depicted in the account posts was positively identified as Rollin 60s crip gang member Matthew RUSSO, a/k/a "Rambo," YOB: 1994. RUSSO posted numerous photographs with firearms and large quantities of marijuana and bundles of cash. In addition, RUSSO posted photographs indicating that he is recruiting individuals for known fraud schemes.



of the UC calls and while in the

April 4, 2022, UC Purchase of Marijuana

4. On April 4, 2022, the UC contacted RUSSO at (954-696-7962) and RUSSO agreed to sell the UC one ounce of marijuana for \$180.00 at the Broward Mall Parking lot (8000 W Broward Blvd. Plantation, FL 33388). At approximately 6:00PM the UC traveled to the Broward Mall parking lot utilizing an undercover vehicle. RUSSO arrived at approximately 6:10 PM as the passenger of a Grey Nissan Altima FL Tag # ECVC19. RUSSO entered the passenger seat of the UC vehicle and provided the UC with approximately one ounce of marijuana in exchange for \$180.00 in pre-recorded

investigative funds. The UC and RUSSO discussed quantities and prices for future deals. The transaction was video, and audio recorded. The evidence was entered in ATF property.

May 25, 2022. UC Purchase of Marijuana & Fentanyl

5. On May 24, 2022, at approximately 7:29PM, the UC contacted RUSSO at cell-phone number (954-696-7962). During the conversation the UC discussed the purchase of one ounce of marijuana from RUSSO. The UC also asked RUSSO if he had “boy”, a common street terminology for heroin. RUSSO said that he did not sell heroin, but he knew people that did. The UC agreed to meet with RUSSO the next day to purchase the heroin and marijuana.

6. On May 25, 2022, at approximately 12:58PM, the UC placed a controlled call to RUSSO. RUSSO told the UC that he was sleeping and to give him another hour. On May 25, 2022, at approximately 1:05PM, the UC received a call from RUSSO. RUSSO stated that his people wanted to know if the UC wanted “fent” a slang terminology for fentanyl. The UC replied with “yeah”. RUSSO advised that he was third partying the deal and just got off the phone with his people. The UC asked RUSSO if his people could do the “7” for \$700 referring to 7 grams of fentanyl for \$700. RUSSO said he would check with his people and get back to the UC.

7. On May 25, 2022, at approximately 3:38 PM the UC arrived at a pre-agreed location RUSSO provided (412 SW 75th Terrace North Lauderdale, FL.) A few moments later the UC observed RUSSO exiting the front door of the residence and RUSSO had a firearm in his front waist band in an appendix carry style holster. RUSSO greeted the UC in the front window of the UC vehicle.

[Left Black]



[Still Shots Taken from May 25, 2022 Transaction. Red Arrow inserted to show firearm location.]

8. After a brief conversation during which RUSSO questioned whether the UC was the police, RUSSO returned to the residence. Shortly thereafter, RUSSO then exited the residence with the one ounce of marijuana and conducted the transaction with the UC for one ounce of marijuana for \$220.00. The UC asked RUSSO, "Your homie said no good on the other?" referring to the 7 grams of fentanyl. RUSSO replied, "My homeboy don't want to give it to you, he say he don't feel comfortable". RUSSO then said, "It's not me, I don't sell this shit, I only sell the weed, and he's real deal, it's him". RUSSO then said he told his friend that the UC said he was not police 5 times to

which RUSSO said that his friend stated, "It's not about that Matt, you got to realize fam, this a dangerous game."

9. RUSSO then said, "I'm going to go talk to him again stay right here." The UC then said, "You can tell him we're cool, whatever he wants to do". RUSSO then said that he was going to just tell him that the UC hit the joint of marijuana and asked the UC once again if he was police to which the UC stated that he was not. RUSSO then re-entered the house and came out with a plastic bag containing a white substance and made the transaction with the UC for \$700.00 in pre-recorded investigative funds. RUSSO then apologized and stated that he wasn't trying to lose customers. RUSSO and the UC then concluded the transaction and RUSSO re-entered the front door of 412 SW 75th Terrace North Lauderdale, FL. The UC then travelled to a pre-determined location followed by members of the ATF and Broward Sheriff's Office cover team. All narcotics were submitted into ATF evidence. The suspected fentanyl was later sent to the DEA Lab. The DEA Lab later confirmed that the white powdery substance provided by RUSSO to the UC weighed 7.5 grams and contained a detectable amount of fentanyl.

June 8, 2022. UC Purchase of Marijuana & Fentanyl

10. On June 8, 2022, at approximately 2:25 p.m., the UC contacted RUSSO via cellphone by calling 954-696-7962. During this call the UC arranged for the purchase of "a zip" which is street terminology for one ounce of marijuana and 7 grams of "fetty" street terminology for fentanyl.

11. On June 8, 2022, at approximately 3:55 PM the UC arrived at the pre-agreed location of 412 SW 75th Terrace North Lauderdale, FL. A few moments later the UC observed RUSSO exiting the front door of the residence, as on May 25, 2023, UC noticed. RUSSO had a firearm in his front waist band in an appendix carry style holster.




[Still Shots Taken from June 8, 2022 Transaction. Red Arrow inserted to show firearm location.]

12. The UC made contact with RUSSO through the driver side window of the UC vehicle. RUSSO then tossed a plastic bag containing the suspected fentanyl inside the UC vehicle and provided the one ounce of marijuana. The UC then provided RUSSO with \$920.00 in pre-recorded ATF investigative funds. RUSSO then thanked the UC for doing business with him and apologized for the previous deal where RUSSO asked the UC if he was police. RUSSO then stated, "We the ones doing business, I can tell a narc from a regular person, but he was just pressuring me. My bad." The UC then travelled to a pre-determined location followed by members of the ATF and Broward Sheriff's Office cover team. All narcotics were initially submitted into ATF evidence. The suspected

fentanyl was later sent to the DEA Lab. The DEA Lab later confirmed the white powdery substance provided by RUSSO to the UC weighed 6.9 grams and contained a detectable amount of fentanyl.

Based on the forgoing, your affiant believes that probable cause exists to arrest Matthew RUSSO, a/k/a "Rambo," YOB: 1994 for possession with the distribution of a controlled substance, to wit fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Jason Davis
Special Agent
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime this 18 day of January, 2024.



HONORABLE ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE